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RACHEL PERILLO

June 8, 2020

Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

United States v. ~~Blondet et. al.~~
including Oscar Valdez-Garcia
16 Cr. 387-4(JMF)

Dear Judge Furman:

We write with the consent of the AUSA in charge of this matter, Lara Pomerantz, seeking an adjournment of Mr. Valdez-Garcia's sentence, which is presently scheduled for September 15, 2020, to a date to be determined four months after the verdict is rendered for those defendants who go to trial. We seek this adjournment based on our belief that the trial will reveal, in greater detail than can be developed pre-trial, Mr. Valdez-Garcia's role in the offense as well as the conditions under which he was raised and lived his whole life.

In addition, while telephonic or video pre-sentence interviews may suffice for many defendants, Mr. Valdez-Garcia suffers from an intellectual disability and often misunderstands or fails to give responsive answers to questions. This hurdle can only be surmounted by an attorney's physical presence during questioning so that the totality of his behavior, including body language, can be assessed by a person who knows him well to insure that his answers are responsive and not attempts to hide his disability, or that the answers betray a lack of understanding on his part. Because all parties agree that it is critical that the probation report contains true and accurate information, and the only way to do so is to adjourn the case we seek this adjournment.

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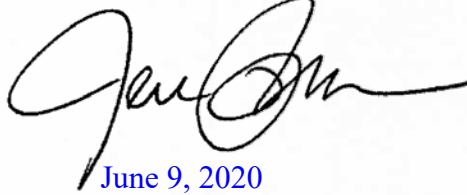
If you have any questions regarding this application please
contact my office.

Respectfully submitted,

/s/
David Stern

Sentencing is hereby ADJOURNED to July 13, 2021, at 3:30 p.m. Counsel should seek an
alternative date in the event that the trial, current scheduled for February 1, 2021, is rescheduled
and/or goes longer than anticipated. The Clerk of Court is directed to terminate Doc. #414.

SO ORDERED



June 9, 2020